

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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CLEMENT DOOKHAN, Individually	:	
and on Behalf of All Other Persons Similarly	:	ECF
Situated,	:	
	:	14 Civ. 4587 (ENV)(JO)
Plaintiff,	:	
	:	
-against-	:	
	:	
BROOKDALE FAMILY CARE CENTERS,	:	
INC., JOYCE WYNTERS, TRINA CORNET,	:	
SUSAN PENNACHIO	:	
	:	
Defendants.	:	
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**STIPULATION EXTENDING DEFENDANTS BROOKDALE FAMILY  
CARE CENTNERS, INC., JOYCE WYNERS AND SUSAN PENNACHIO'S  
TIME TO RESPOND TO THE AMENDED COMPLAINT**

**IT IS HEREBY STIPULATED, CONSENTED TO AND AGREED** by and  
between the Parties through their undersigned counsel as follows:

- 1) Plaintiff shall file an Amended Complaint on or before Friday September 19, 2014;
- 2) Defendants Brookdale Family Care Centers, Inc., Joyce Wynters and Susan Pennachio shall file an Answer or other response to the operative Complaint on or before October 10, 2014;
- 3) This is the second request to extend the Defendants' time to respond to the Complaint. This request will not unduly delay the proceedings as it extends the deadline to respond to the Complaint from October 3, 2014 to October 10, 2014. Counsel for the parties are in the process of addressing limiting the scope of the claims asserted and the operative facts.

LAW OFFICE OF WILLIAM COUDERT RAND  
*ATTORNEY FOR PLAINTIFF*  
488 Madison Avenue, Suite 1100  
New York, New York 10022  
(212) 286-1425

By: WACR  
WILLIAM COUDERT RAND, ESQ.

Dated: 9/16/14

JACKSON LEWIS P.C.  
*ATTORNEYS FOR DEFENDANTS*  
*BROOKDALE FAMILY CARE CENTERS,*  
*INC., JOYCE WYNTERS AND SUSAN*  
*PENNACHIO*  
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(631) 247-0404

By: Paul J. Siegel (attached by PJS)  
PAUL J. SIEGEL, ESQ.

Dated: 9/16/14

SO ORDERED on this \_\_\_\_ day of \_\_\_\_\_, 2014

\_\_\_\_\_  
United States District Judge